



January 26, 2009

Anna Marie Young  
Governor's Office of Planning and Research  
P.O. Box 3022  
Sacramento, CA 95812-3044  
[emailed to CEQA.GHG@opr.ca.gov]

**re: comments on *Preliminary Draft CEQA Guideline Amendments for Green House Gas Emissions***

Dear Ms. Young:

On behalf of the 10,000 members of the San Francisco Bicycle Coalition, I am writing to express our strong support for the proposed modifications to the CEQA Guidelines checklist ("Appendix G") contained in the Office of Planning and Research's *Preliminary Draft CEQA Guideline Amendments for Green House Gas Emissions* released on January 8, 2009.

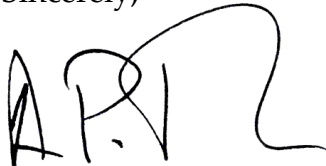
As in many cities and counties across California, San Francisco's declared and adopted policies (including our City Charter, General Plan, and Climate Action Plan) are poorly supported by transportation impact analysis under current CEQA practice. In particular, intersection congestion analyzed and prioritized via automobile level of service analysis ("auto LOS") causes significant burdens and obstacles, directly and indirectly, to planning efforts for policy-coherent land use and transportation.

Elimination of auto LOS as an environmental concern under CEQA, through the proposed modification to Appendix G, would be enormously beneficial to San Francisco's efforts to align its transportation and land use planning with its own adopted policies and goals, as well as statewide goals for climate protection as mandated in AB 32 and related law.

The proposed modifications to the Appendix G checklist will complement San Francisco's efforts to establish and adopt a substitute transportation impact measure in the form of Automobile Trip Generation (ATG) to replace auto LOS in San Francisco's CEQA practice. Like many jurisdictions across California, San Francisco binds its own initial study checklist to the state guidelines, and this amendment would both expedite and endorse San Francisco's use of ATG as a CEQA-compliant environmental indicator and metric.

I would also like to express our strong support for the proposed elimination of automobile parking supply as an environmental concern under CEQA. As you know, San Francisco has effectively established that concern for "parking deficit" *per se* is a social matter, not an environmental matter for CEQA review (*San Franciscans Upholding the Downtown Plan v. City & County of SF*, 2002). As with the recommendation to eliminate auto LOS, striking parking capacity from the Appendix G checklist would essentially codify this understanding and extend it to the entire state, and bring significant benefits to the practice of CEQA analysis for the sake of greenhouse gas emission reduction and climate protection, as well as other important policy objectives for transportation and land use.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Thornley', with a long horizontal flourish extending to the right.

Andy Thornley  
Program Director  
San Francisco Bicycle Coalition

cc: Mayor Gavin Newsom  
John Rahaim, SF Planning  
Jose Luis Moscovich, SF County Transportation Authority  
Nathaniel Ford, SF Municipal Transportation Agency